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Attorneys for Plaintiff
TIGER NATURAL GAS, INC.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re)	CASE NO. 19-30088 (DM)
)	
PG&E CORPORATION)	Chapter 11
)	(Lead Case)
-and-)	(Jointly Administered)
)	
PACIFIC GAS AND ELECTRIC)	TIGER NATURAL GAS, INC.'S
COMPANY,)	MOTION TO FILE CERTAIN
)	DOCUMENTS UNDER SEAL
Debtors.)	PURSUANT TO 11 U.S.C. §§ 105(A) AND
)	107(B) AND FRBP 9018
<input type="checkbox"/> Affects PG&E Corporation)	
<input checked="" type="checkbox"/> Affects Pacific Gas and Electric)	
Company)	[No Hearing Requested]
<input type="checkbox"/> Affects both Debtors)	
)	
<i>*All papers shall be filed in the Lead Case,</i>)	
<i>No. 19-30088 (DM)</i>)	

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1 with respect to a trade secret or confidential research, development, or commercial information.”
2 11 U.S.C. § 107(b).

3 2. An entity seeking protection under Section 107(b) need only show that the
4 information it seeks to seal is “confidential” and “commercial” in nature. *Video Software Dealers*
5 *Ass’n v. Orion Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994).

6 3. The District Court’s Protective Order, dated April 11, 2019 [Dkt. #64] provides
7 that “Protected Material” includes “Confidential” or “Attorney’s Eyes Only” material. The
8 Protective Order limits public disclosure of such material and provides: “Without written
9 permission from the Designating Party or a court order secured after appropriate notice to all
10 interested persons, a Party may not file in the public record in this action any Protected
11 Material. A Party that seeks to file under seal any Protected Material must comply with Civil
12 Local Rule 79-5.” The documents listed below are therefore sealable because Debtor PG&E, the
13 producing party, designated each as “Attorney’s Eyes Only” and said documents have been filed
14 under seal contemporaneously herewith:

15 a) Relevant excerpts from the Deposition Transcript of Michael Quinn, Ph.D, dated
16 September 29, 2017; and

17 b) Relevant excerpts from the Deposition Transcript of Daniel W. Ray, dated
18 October 4, 2017 (collectively the “Protected Material”).

19 4. A copy of counsel’s declaration in support of this Motion to File Under Seal is
20 being filed contemporaneously herewith.

21 5. Because the deposition transcript excerpts contain information marked “Protected
22 Material” within the scope of the Protective Order, the Court should grant Tiger’s request.

23 **III. NOTICE**

24 Notice of the Motion to File Under Seal will be provided to (i) the Debtors and counsel to the
25 Debtors; (ii) counsel to the Office of the United States Trustee for Region 17; (iii) counsel to the
26 administrative agent under the Debtors’ debtor-in-possession financing facility; (iv) counsel to
27 the collateral agent under the Debtors’ debtor-in-possession financing facility; (v) counsel to the
28 CPUC; (vi) the U.S. Nuclear Regulatory Commission; (vii) the U.S. Department of Justice, as

1 counsel for the United States on behalf of the Federal Energy Regulatory Commission; (viii)
2 each member of the Official Committee of Unsecured Creditors specified in the Notice of
3 Appointment of the Official Committee of Unsecured Creditors [Docket 409]; (ix) each member
4 of the Official Committee of Tort Claimants specified in the Notice of Appointment of the
5 Official Committee of Tort Claimants [Docket 453]; and (x) those parties who have requested
6 notice pursuant to Fed. R. Bankr. P. 2002.

7 **IV. CONCLUSION**

8 To ensure compliance with the Protective Order in the District Court Case, Tiger seeks
9 limited relief to file the Protected Material under seal in connection with its Reply in
10 Support of Motion for Relief from Automatic Stay. For the reasons set forth above, Tiger
11 requests that the documents be kept under seal as set forth in the Proposed Order.

12
13 DATED: November 11, 2019

14 Respectfully submitted,

15 HOLLAND & KNIGHT LLP

16
17 By: /s/ Leah E. Capritta
Leah E. Capritta

18 *Attorneys for Tiger Natural Gas, Inc.*
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SAN FRANCISCO DIVISION

In re)	CASE NO. 19-30088 (DM)
)	
PG&E CORPORATION)	Chapter 11
)	(Lead Case)
-and-)	(Jointly Administered)
)	
PACIFIC GAS AND ELECTRIC)	
COMPANY,)	ORDER GRANTING TIGER NATURAL
)	GAS, INC.'S ADMINISTRATIVE
Debtors.)	MOTION TO FILE CERTAIN
)	DOCUMENTS UNDER SEAL
<input type="checkbox"/> Affects PG&E Corporation)	
<input checked="" type="checkbox"/> Affects Pacific Gas and Electric Company)	[NO HEARING REQUIRED]
<input type="checkbox"/> Affects both Debtors)	
)	
<i>*All papers shall be filed in the Lead Case,</i>)	
<i>No. 19-30088 (DM)</i>)	

1 This matter came before the Court on Tiger Natural Gas, Inc.'s ("Tiger") Motion to
2 File Certain Documents Under Seal (the "Motion"). The Court having considered the Motion,
3 the declaration filed in support, any response and reply briefing, its files and records herein, and
4 being fully advised,

5 IT IS HEREBY ORDERED, DECREED, AND ADJUDGED that the Motion is
6 GRANTED; and

7 IT IS HEREBY FURTHER ORDERED, DECREED, AND ADJUDGED that Tiger is
8 authorized to file the excerpts from the documents listed below under seal pursuant to section
9 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018 in connection with its Reply in Support
10 of Motion for Relief from Automatic Stay:

11 a) Deposition Transcript of Michael Quinn, Ph.D, dated September 29, 2017; and

12 b) Deposition Transcript of Daniel W. Ray, dated October 4, 2017.

13 IT IS HEREBY FURTHER ORDERED, DECREED, AND ADJUDGED that this Court
14 shall retain jurisdiction to hear and determine all matters arising from or related to the
15 implementation, interpretation, or enforcement of this Order.

16 IT IS HEREBY FURTHER ORDERED, DECREED, AND ADJUDGED that notice of
17 the Motion as provided therein shall be deemed good and sufficient and the requirements of the
18 Bankruptcy Local Rules are satisfied by such notice.

19 ****End of Order****